

LAW OFFICES OF HARVEY AND VANDAMME  
Attorneys for Defendant  
*STOP & STOR*  
Hendrick Vandamme (HV-7702)  
90 Broad Street, Suite 2202  
New York, NY 10004  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EASYTEX CORPORATION LIMITED,

Plaintiff,

Index No.: 07-CV-03907-BSJ

-against-

PETER & FRANK OF NY, CORP., CHUL KYU KIM a/k/a  
KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT  
CHUL KIM a/k/a CHUL KYOO KIM a/k/a CHULKYOO KIM  
a/k/a KIM K. CHUL, BARO SHIPPING CO., LTD., TOP TEN  
TRANS, INC., GFA, INC., 3 WIN INC., MERCURY,  
AMERICANINTERNATIONAL LINE, INC., SOON CHAN  
HONG a/k/a SOON C. HONG a/k/a SOONCHAN C. HONG  
a/k/a SOON CHANGE HONG a/k/a CHAN S. HONG a/k/a  
HONG S. CHAN a/k/a HONG SOON CHANG d/b/a  
SOONCHAN HONG CUSTOM HOUSE BROKER, STOP &  
STOR, jointly and severally,

**VERIFIED ANSWER TO FIRST  
AMENDED COMPLAINT**

Defendants.

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Defendant, STOP & STOR, by and through its attorneys, the Law Offices of Harvey and Vandamme,  
as and for a Verified Answer to the First Amended Verified Complaint of the plaintiff, alleges as follows upon  
information and belief:

**FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraphs "1" of the First Amended Verified Complaint.

**SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "2" of the First Amended Verified Complaint.

**THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "3" of the First Amended Verified Complaint.

**FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "4" of the First Amended Verified Complaint.

**FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "5" of the First Amended Verified Complaint.

**SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "6" of the First Amended Verified Complaint.

**SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "7" of the First Amended Verified Complaint.

**EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "8" of the First Amended Verified Complaint.

**NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "9" of the First Amended Verified Complaint.

**TENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "10" of the First Amended Verified Complaint.

**ELEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "11" of the First Amended Verified Complaint.

**TWELFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "12" of the First Amended Verified Complaint.

**THIRTEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "13" of the First Amended Verified Complaint.

**FOURTEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "14" of the First Amended Verified Complaint.

**FIFTEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "15" of the First Amended Verified Complaint.

**SIXTEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "16" of the First Amended Verified Complaint.

**SEVENTEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "17" of the First Amended Verified Complaint.

**EIGHTEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "18" of the First Amended Verified Complaint.

**NINETEENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "19" of the First Amended Verified Complaint.

**TWENTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "20" of the First Amended Verified Complaint.

**TWENTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "21" of the First Amended Verified Complaint.

**TWENTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "22" of the First Amended Verified Complaint.

**TWENTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "23" of the First Amended Verified Complaint.

**TWENTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "24" of the First Amended Verified Complaint.

**TWENTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "25" of the First Amended Verified Complaint.

**TWENTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "26" of the First Amended Verified Complaint.

**TWENTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "27" of the First Amended Verified Complaint.

**TWENTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “28” of the First Amended Verified Complaint.

**TWENTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “29” of the First Amended Verified Complaint.

**THIRTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “30” of the First Amended Verified Complaint.

**THIRTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “31” of the First Amended Verified Complaint.

**THIRTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “32” of the First Amended Verified Complaint.

**THIRTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “33” of the First Amended Verified Complaint.

**THIRTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “34” of the First Amended Verified Complaint.

**THIRTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “35” of the First Amended Verified Complaint.

**THIRTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “38” of the First Amended Verified Complaint.

**THIRTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "39" of the First Amended Verified Complaint.

**THIRTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "40" of the First Amended Verified Complaint.

**THIRTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "41" of the First Amended Verified Complaint.

**FORTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "42" of the First Amended Verified Complaint.

**FORTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "43" of the First Amended Verified Complaint.

**FORTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "44" of the First Amended Verified Complaint.

**FORTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "45" of the First Amended Verified Complaint.

**FORTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "46" of the First Amended Verified Complaint.

**FORTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "47" of the First Amended Verified Complaint.

**FORTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "48" of the First Amended Verified Complaint.

**FORTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "49" of the First Amended Verified Complaint.

**FORTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "50" of the First Amended Verified Complaint.

**FORTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "51" of the First Amended Verified Complaint.

**FIFTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "52" of the First Amended Verified Complaint.

**FIFTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "53" of the First Amended Verified Complaint.

**FIFTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "54" of the First Amended Verified Complaint.

**FIFTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "55" of the First Amended Verified Complaint.

**FIFTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "57" of the First Amended Verified Complaint.

**FIFTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "58" of the First Amended Verified Complaint.

**FIFTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "59" of the First Amended Verified Complaint.

**FIFTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "60" of the First Amended Verified Complaint.

**FIFTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "61" of the First Amended Verified Complaint.

**FIFTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "62" of the First Amended Verified Complaint.

**SIXTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "63" of the First Amended Verified Complaint.

**SIXTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "64" of the First Amended Verified Complaint.

**SIXTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "65" of the First Amended Verified Complaint.

**SIXTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "66" of the First Amended Verified Complaint.



**SIXTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “67” of the First Amended Verified Complaint.

**SIXTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “68” of the First Amended Verified Complaint.

**SIXTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “69” of the First Amended Verified Complaint.

**SIXTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “70” of the First Amended Verified Complaint.

**SIXTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “71” of the First Amended Verified Complaint.

**SIXTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “72” of the First Amended Verified Complaint.

**SEVENTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “73” of the First Amended Verified Complaint.

**SEVENTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “74” of the First Amended Verified Complaint.

**SEVENTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “75” of the First Amended Verified Complaint.

**SEVENTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “76” of the First Amended Verified Complaint.

**SEVENTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “77” of the First Amended Verified Complaint.

**SEVENTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “78” of the First Amended Verified Complaint.

**SEVENTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “79” of the First Amended Verified Complaint.

**SEVENTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “80” of the First Amended Verified Complaint.

**SEVENTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “81” of the First Amended Verified Complaint.

**SEVENTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “82” of the First Amended Verified Complaint.

**EIGHTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “83” of the First Amended Verified Complaint.

**EIGHTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “84” of the First Amended Verified Complaint.

**EIGHTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “85” of the First Amended Verified Complaint.

**EIGHTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “86” of the First Amended Verified Complaint.

**EIGHTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “87” of the First Amended Verified Complaint.

**EIGHTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “88” of the First Amended Verified Complaint.

**EIGHTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “89” of the First Amended Verified Complaint.

**EIGHTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “90” of the First Amended Verified Complaint.

**EIGHTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “91” of the First Amended Verified Complaint.

**EIGHTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “92” of the First Amended Verified Complaint.

**NINETIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “93” of the First Amended Verified Complaint.

**NINETY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "94" of the First Amended Verified Complaint.

**NINETY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "95" of the First Amended Verified Complaint.

**NINETY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "96" of the First Amended Verified Complaint.

**NINETY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "97" of the First Amended Verified Complaint.

**NINETY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "98" of the First Amended Verified Complaint.

**NINETY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "99" of the First Amended Verified Complaint.

**NINETY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "100" of the First Amended Verified Complaint.

**NINETY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "101" of the First Amended Verified Complaint.

**NINETY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "102" of the First Amended Verified Complaint.

**ONE HUNDREDTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “103” of the First Amended Verified Complaint.

**ONE HUNDRED FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “104” of the First Amended Verified Complaint.

**ONE HUNDRED SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “105” of the First Amended Verified Complaint.

**ONE HUNDRED THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “106” of the First Amended Verified Complaint.

**ONE HUNDRED FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “107” of the First Amended Verified Complaint.

**ONE HUNDRED FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “110” of the First Amended Verified Complaint.

**ONE HUNDRED SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “111” of the First Amended Verified Complaint.

**ONE HUNDRED SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “112” of the First Amended Verified Complaint.

**ONE HUNDRED EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “113” of the First Amended Verified Complaint.

**ONE HUNDRED NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "114" of the First Amended Verified Complaint.

**ONE HUNDRED TENTH:** Denies each and every allegation contained in Paragraph "36" of the First Amended Verified Complaint.

**ONE HUNDRED ELEVENTH:** Denies each and every allegation contained in Paragraph "37" of the First Amended Verified Complaint.

**ONE HUNDRED TWELFTH:** Denies each and every allegation contained in Paragraph "108" of the First Amended Verified Complaint.

**ONE HUNDRED THIRTEENTH:** Denies each and every allegation contained in Paragraph "109" of the First Amended Verified Complaint.

**ONE HUNDRED FOURTEENTH:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph "56" of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**AS AND FOR AN ANSWER TO COUNT I**

**ONE HUNDRED FIFTEENTH:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph "15" of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**ONE HUNDRED SIXTEENTH:** Denies each and every allegation contained in Paragraph "116" of the First Amended Verified Complaint.

**ONE HUNDRED SEVENTEENTH:** Denies each and every allegation contained in Paragraph "117" of the First Amended Verified Complaint.

**ONE HUNDRED EIGHTEENTH:** Denies each and every allegation contained in Paragraph "118" of the First Amended Verified Complaint.

**ONE HUNDRED NINETEENTH:** Denies each and every allegation contained in Paragraph “119” of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT II**

**ONE HUNDRED TWENTIETH:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph “120” of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**ONE HUNDRED TWENTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “121” of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “122” of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “123” of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “124” of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “125” of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT III**

**ONE HUNDRED TWENTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “126” of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "127" of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "128" of the First Amended Verified Complaint.

**ONE HUNDRED TWENTY-NINTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "129" of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT IV**

**ONE HUNDRED THIRTIETH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "130" of the First Amended Verified Complaint.

**ONE HUNDRED THIRTY-FIRST:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "131" of the First Amended Verified Complaint.

**ONE HUNDRED THIRTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "132" of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT V**

**ONE HUNDRED THIRTY-THIRD:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph "133" of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**ONE HUNDRED THIRTY-FOURTH:** Denies each and every allegation contained in Paragraph "134" of the First Amended Verified Complaint.



**ONE HUNDRED THIRTY-FIFTH:** Denies each and every allegation contained in Paragraph “135” of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT VI**

**ONE HUNDRED THIRTY-SIXTH:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph “136” of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**ONE HUNDRED THIRTY-SEVENTH:** Denies each and every allegation contained in Paragraph “137” of the First Amended Verified Complaint.

**ONE HUNDRED THIRTY-EIGHTH:** Denies each and every allegation contained in Paragraph “138” of the First Amended Verified Complaint.

**ONE HUNDRED THIRTY-NINTH:** Denies each and every allegation contained in Paragraph “139” of the First Amended Verified Complaint.

**ONE HUNDRED FORTIETH:** Denies each and every allegation contained in Paragraph “140” of the First Amended Verified Complaint.

**ONE HUNDRED FORTY-FIRST:** Denies each and every allegation contained in Paragraph “141” of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT VII**

**ONE HUNDRED FORTY-SECOND:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph “142” of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**ONE HUNDRED FORTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “143” of the First Amended Verified Complaint.

**ONE HUNDRED FORTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “144” of the First Amended Verified Complaint.

**ONE HUNDRED FORTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “145” of the First Amended Verified Complaint.

**ONE HUNDRED FORTY-SIXTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “146” of the First Amended Verified Complaint.

**ONE HUNDRED FORTY-SEVENTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “147” of the First Amended Verified Complaint.

**ONE HUNDRED FORTY-EIGHTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph “148” of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT VIII**

**ONE HUNDRED FORTY-NINTH:** Repeats, reiterates and realleges each and every admission, denial, and denial of knowledge or information heretofore interposed in response to Paragraph “149” of the First Amended Verified Complaint with the same force and effect as if set forth at length herein.

**ONE HUNDRED FIFTIETH:** Denies each and every allegation contained in Paragraph “150” of the First Amended Verified Complaint.

**ONE HUNDRED FIFTY-FIRST:** Denies each and every allegation contained in Paragraph “151” of the First Amended Verified Complaint.

**AS AND FOR AN ANSWER TO COUNT VIII**

**ONE HUNDRED FIFTY-SECOND:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "152" of the First Amended Verified Complaint.

**ONE HUNDRED FIFTY-THIRD:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "153" of the First Amended Verified Complaint.

**ONE HUNDRED FIFTY-FOURTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "154" of the First Amended Verified Complaint.

**ONE HUNDRED FIFTY-FIFTH:** Denies knowledge or information sufficient to form a belief as to each and every allegation contained in Paragraph "155" of the First Amended Verified Complaint.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

**ONE HUNDRED FIFTY-SIXTH:** The injuries alleged to have been suffered by plaintiff were caused, in whole or part, by the conduct of plaintiff. Plaintiff claims are barred or diminished in the proportion that such culpable conduct of plaintiff bears to the total culpable conduct causing the damages.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

**ONE HUNDRED FIFTY-SEVENTH:** The injuries alleged to have been suffered by plaintiff were caused, in whole or part, by the conduct of parties or entities over whom this answering defendant had no authority or control. Plaintiff's recovery against this answering defendant is barred or diminished in the proportion that such culpable conduct of parties or entities over whom this answering defendant had no authority or control bears to the total culpable conduct causing the damages.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

**ONE HUNDRED FIFTY-EIGHTH:** Stop & Stor acted lawfully without any malice or intent to conspire.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED FIFTY-NINTH:** The cause(s) of action were not commenced within the time of the applicable statute of limitations.

**AS AND FOR A FIFTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTIETH:** Plaintiff are precluded from maintaining this action by Insurance Law Article 51 in that plaintiff have failed to sustain a serious injury or economic loss greater than the basic economic loss as defined by that law.

**AS AND FOR A SIXTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTY-FIRST:** Pursuant to CPLR Article 16, the liability of this defendant for non-economic loss shall not exceed the equitable share of this defendant determined in accordance with the relative culpability of each person/party causing or contributing to the total liability for non-economic loss.

**AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTY-SECOND:** The First Amended Verified Complaint fails to state a cause of action upon which relief may be had.

**AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTY-THIRD:** Stop & Stor was never in possession of any of the Plaintiff's goods.

**AS AND FOR A NINTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTY-FOURTH:** The cause of action may not be maintained because of arbitration and award, collateral estoppel, payment, or res judicata.

**AS AND FOR A TENTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTY-FIFTH:** That if it is determined that this answering defendant is responsible for the acts alleged in the complaint then plaintiff failed to take appropriate action to mitigate any damages.

**AS AND FOR A TENTH AFFIRMATIVE DEFENSE**

**ONE HUNDRED SIXTY-SIXTH:** The Plaintiff's claims as asserted against Stop & Stor are frivolous and sanctionable.

**AS AND FOR A FIRST COUNTER-CLAIM AGAINST PLAINTIFF**

**ONE HUNDRED SIXTY-SEVENTH:** If any plaintiff recovers against this defendant then this defendant) will be entitled to an apportionment of responsibility for damages between and amongst the parties of this action and will be entitled to recover from each other party for its proportional share commensurate with any judgment which may be awarded to plaintiff.

**AS AND FOR A SECOND COUNTER-CLAIM AGAINST PLAINTIFF**

**ONE HUNDRED SIXTY-EIGHTH:** If any plaintiff recovers against this defendant then this defendant will be entitled to be indemnified and to recover the full amount of any judgment from plaintiff.

**AS AND FOR A FIRST CROSS-CLAIM AGAINST CO-DEFENDANTS**

**ONE HUNDRED SIXTY-NINTH:** If any plaintiff recovers against this defendant then this defendant will be entitled to an apportionment of responsibility for damages between and amongst the parties of this action and will be entitled to recover from each other party for its proportional share commensurate with any judgment which may be awarded to plaintiff.

**AS AND FOR A SECOND CROSS-CLAIM AGAINST CO-DEFENDANT**

**ONE HUNDRED SEVENTIETH:** If any plaintiff recovers against this defendant then this defendant will be entitled to be indemnified and to recover the full amount of any judgment from co-defendants.

**ONE HUNDRED SEVENTY-FIRST:** Stop Stor incorporates by reference all defenses asserted by other co-defendants, in particular the twelfth affirmative defenses of American International Lines which states that


“Plaintiff’s claims are barred because the Plaintiff is clearly misusing litigation by suing numerous defendants [with no known connection to the Plaintiff’s alleged losses that have no liability to the Plaintiff, for purposes of (i) coercing settlements; (ii) obtaining low-cost and continuing discovery against the Defendants; and hoping that

somehow, if the Plaintiff keeps this case open long enough, the Plaintiff and its attorneys will find someone to blame for Plaintiff's losses other than the obvious Defendants with whom the Plaintiff contracted."

**WHEREFORE**, defendant STOP & STOR, respectfully request that this Court dismiss the First Amended Complaint of the Plaintiff with prejudice and award defendant Stop & Stor such other, further or different relief as the Court may deem just and proper.

Dated: New York, New York  
July 2, 2008

LAW OFFICES OF HARVEY AND  
VANDAMME  
Attorneys for Defendant  
*STOP & STOR*

By:   
Hendrick Vandamme (HV7702)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
EASYTEK CORPORATION LIMITED,

Plaintiff,

-against-

PETER & FRANK OF NY, CORP., CHUL KYU KIM a/k/a KIM  
CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT CHUL  
KIM a/k/a CHUL KYOO KIM a/k/a CHULKYOO KIM a/k/a  
KIM K. CHUL, BARO SHIPPING CO., LTD., TOP TEN  
TRANS, INC., GFA, INC., 3 WIN INC., MERCURY,  
AMERICANINTERNATIONAL LINE, INC., SOON CHAN  
HONG a/k/a SOON C. HONG a/k/a SOONCHAN C. HONG a/k/a  
SOON CHANGE HONG a/k/a CHAN S. HONG a/k/a HONG S.  
CHAN a/k/a HONG SOON CHANG d/b/a SOONCHAN HONG  
CUSTOM HOUSE BROKER, STOP & STOR, jointly and  
severally,

Defendants.  
-----X


The undersigned, an attorney admitted to practice in the courts of the State of New York, and a  
principal in the law firm of the Law Offices of Harvey and Vandamme, attorneys or record for the defendant,  
STOP & STOR herein, affirms the truth of the following pursuant to CPLR 2106:

That I have read the attached **VERIFIED ANSWER** and its contents are true to my knowledge,  
except as to the matters alleged on information and belief, and as to those matters, I believe them to be true to  
the best of my knowledge.

That the source of my information is facts as ascertained from the defendant, upon investigation and  
the files maintained in my law office.

That this verification is made by me, as the attorney, and not the defendant as they do not reside  
within New York County, the place where I maintain my law office, or they are presently outside New York  
County in which your affirmant maintains a law office.

Dated: New York, New York  
July 2, 2008

  
Hendrick Vandamme

Index No. 07-CV-03907-BSJ

**ATTORNEY'S  
VERIFICATION**



**CERTIFICATE OF SERVICE**

**HENDRICK VANDAMME, ESQ.** affirms the following under the penalties of perjury under the law of the United States and the State of New York:

I am an attorney at law admitted to practice before the Courts of the State of New York and this Court.

I am an attorney of the firm of the Law Offices of Harvey and Vandamme, the attorneys of record for the defendant, STOP & STOR, in this action. I am over the age of eighteen and not a party to the action.

On July 2, 2008, I served the within **VERIFIED ANSWER TO FIRST AMENDED VERIFIED COMPLAINT** upon:

TO: Chull S. Park, Esq. [CP2061]  
Hyun Suk Choi, Esq. [HC4208]  
THE PARK LAW GROUP, LLC  
Attorneys for Plaintiff  
*EASYTEX CORPORATION LIMITED*  
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by depositing a true copy thereof enclosed in a properly addressed postpaid envelop in a mail depository under the exclusive control of the United States Postal Service in the State of New York.

Dated: New York, New York  
July 2, 2008

A handwritten signature in dark ink, appearing to read "Hendrick Vandamme", written over a horizontal line.

Hendrick Vandamme

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
EASYTEK CORPORATION LIMITED,

Index No. 07-CV-03907-BSJ

Plaintiff

-against-

PETER & FRANK OF NY, CORP., CHUL KYU KIM a/k/a  
KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT  
CHUL KIM a/k/a CHUL KYOO KIM a/k/a CHULKYOO KIM  
a/k/a KIM K. CHUL, BARO SHIPPING CO., LTD., TOP TEN  
TRANS, INC., GFA, INC., 3 WIN INC., MERCURY,  
AMERICANINTERNATIONAL LINE, INC., SOON CHAN  
HONG a/k/a SOON C. HONG a/k/a SOONCHAN C. HONG  
a/k/a SOON CHANGE HONG a/k/a CHAN S. HONG a/k/a  
HONG S. CHAN a/k/a HONG SOON CHANG d/b/a  
SOONCHAN HONG CUSTOM HOUSE BROKER, STOP &  
STOR, jointly and severally,

Defendants

-----X

---

**VERIFIED ANSWER VERIFIED ANSWER  
TO FIRST AMENDED VERIFIED COMPLAINT**

---

**LAW OFFICES OF HARVEY AND VANDAMME**

Attorneys for Defendant

STOP & STOR

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New York, NY 10004

(646) 428-2650